

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

MELINDA and MARK LOE, *et al.*,

*Plaintiffs,*

v.

WILLIE JETT, *et al.*,

*Defendants.*

Civil No. 0:23-cv-01527-NEB-JFD

**DECLARATION OF  
CROWN COLLEGE  
IN SUPPORT OF  
PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT**

I, Christopher Mathews, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18 and have personal knowledge or knowledge based on organizational documents of all contents of this declaration. These organizational documents were prepared as a regularly conducted business activity by Crown College staff who have knowledge of the underlying information.

2. I currently serve as the Vice President of Academic Affairs at Crown College ("Crown"). I have served in that role for approximately three years. I was designated as the Rule 30(b)(6) witness for Crown and testified in a deposition in this case in that capacity. I am duly authorized to offer this testimony on behalf of Crown.

3. Through my experience in this role, I am familiar with Crown's application and admissions process for undergraduate students and for students applying for the Post-Secondary Enrollment Options (PSEO) program.

4. For the PSEO program, students submit an application for admission that includes the following information: the student's biographical information; the student's academic information including high school attendance and previous participation in rigorous coursework; and the student's anticipated PSEO course load and future undergraduate major of interest.

5. If a student indicates that he or she is interested in attending PSEO courses on-campus, the application also includes several components addressing the student's Christian faith to assess the student's spiritual fit with Crown's campus community.

6. For on-campus applications, the application requests that the student respond to several Spiritual Life Essay questions.

7. The first essay question is: "Please tell us how you committed your life to Jesus."

8. The second essay question is: "Please share with us how your faith affects your daily life. List any experiences or influences that impact your spiritual development."

9. The third essay question is: "Crown College is a distinctly and intentionally Christian environment. Students are required to serve

others and the community, and to conduct themselves in a Christ-like manner. With that in mind, please describe why you are interested in attending Crown College and how this environment fits with your character.”

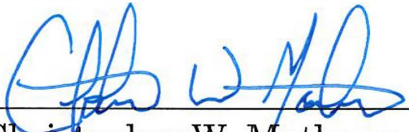
10. The on-campus application also includes the full text of Crown’s Community Covenant. It asks the student to affirm the following statement: “I have read the Crown College Community Covenant and commit myself to full compliance while enrolled at Crown College.”

11. Spiritual fit is a consideration for every applicant to the on-campus PSEO program. The online PSEO program does not evaluate spiritual fit and does not reference the Community Covenant.

12. Typically, if a student is denied admission to the on-campus program but meets Crown’s academic requirements, the student is admitted to the online PSEO program.

13. For purposes of this lawsuit, members of Crown’s admissions department reviewed admissions policies and decisions dating back to July 7, 2017. Based on the findings of that review, Crown has not denied any applicant admission to its undergraduate program or the PSEO program based on the student’s race, ethnicity, disability, gender, or sexual orientation.

Respectfully submitted this 28th day of August, 2024.



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Christopher W. Mathews